

**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT SUBMISSIONS  
OMB No. 1530-0059**

**FS Form 1849: Disclaimer and Consent With Respect to United States Treasury Securities**

**A. Justifications.**

**1. Explain the circumstances that make this collection of information necessary.**

**Identify any legal or administrative requirements that necessitate the collection.**

This information is collected by authority of 31 U.S.C. 3102, *et seq.*; and 31 CFR Part 323. A disclaimer and consent may be necessary when, as the result of an error in registration or otherwise, the payment, refund of purchase price, or reissue of savings bonds/notes as requested by one person would appear to affect the right, title or interest of some other person.

**2. Indicate how, by whom and for what purpose is this information used?**

The information on the completed form is used by the Department of the Treasury, Bureau of the Fiscal Service to complete transactions requested by owners of definitive securities. The form is completed by the person giving his/her disclaimer and consent to the requested transaction. Without the use of this form, the Bureau could create a potential legal liability to the United States Government by incorrectly disposing of savings bonds/notes.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?**

The form in this collection is available in electronic format. Users can download the form from the Fiscal Service website and complete it on their own, or a Customer Service Representative may complete all or part of the form for the registered owner and send it for confirmation.

**4. Describe efforts are used to identity duplication? Why can't any similar information already available be used or modified for use for the purposes described in Item 2 above?**

The information from the form is collected for a single purpose as described in item 1. No other federal governmental agency collects this type of information, therefore, no duplication exists.

**5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?**

This collection of information does not impact small businesses or other small entities.

**6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?**

Without the use of this form, the Bureau could create a potential legal liability to the United States Government by incorrectly disposing of savings bonds/notes.

**7. Is this collection of information conducted in a manner consistent with the guidelines of 5 CFR 1320.6?**

This information collection is consistent with 5 CFR 1320.6 There are no special circumstances that would cause information collected to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, pre-tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by the authority established in the statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

**8. What effort was made to notify the general public about this collection of information?**

The Bureau's notice was published in Volume 89 of the Federal Register on August 15, 2024, page 66495. No comments were received.

**9. What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?**

Gifts or payments are not provided to respondents.

**10. What assurance of confidentiality was provided to respondents and what was the**

**basis for the assurance in statute, regulations, or agency policy?**

Aside from protections contained in the Privacy Act, there is no guarantee of confidentiality.

**11. What justification is there for questions of a sensitive nature?**

There are no questions of a sensitive nature. Personally identifiable information (PII) collected on this form is necessary to identify the registered owner(s) along with the securities authorized for conversion, payment, or other transactions. An applicable System of Records Notice for this information was published February 27, 2020. System of Records Name: Treasury/Fiscal Service .014—United States Securities and Access. The privacy impact assessment (PIA) conducted for this collection of information can be found at <https://www.fiscal.treasury.gov/files/pia/trespclia.pdf>

**12. What is the estimated hour burden of this collection of information?**

The average time required to complete the form is 6 minutes multiplied by the estimated number of forms completed (450) reflects the total burden of 45 hours.

A. Estimate of Burden Hours

Form	No. of Respondents	No. of Responses Per Respondent	No. of Annual Responses	Hours Per Response	Total Annual Burden
FS FORM 1849	450	1	1	6 minutes (0.1 hours)	45

B. Estimate of Annual Respondent Cost.

Form	No. of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate <sup>1</sup>	Total Annual Respondent Cost
FS Form 1849	450	1	6 minutes (0.1 hours)	450	\$45.33	\$20,398.50

<sup>1</sup> It is expected that respondents to this collection could be from any occupation. The average wage rate for all occupations is \$ 31.48 according to the May 2023 National Occupational Employment and Wage Estimates. [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm) A benefit multiplier of 1.44 is used to calculate a fully-loaded wage rate of  $31.48 \times 1.44 = \$45.33$

Using the BLS Employer Costs for Employee Compensation – March 2020 report <https://www.bls.gov/news.release/pdf/eccec.pdf>, a benefit multiplier of 1.44 was calculated by taking the private industry worker 50<sup>th</sup> (median) wage percentile total compensation rate divided by the wages and salaries rate.  $\$26/\$18.05 = 1.44$

**13. What is the estimated total annual cost burden to respondents or recordkeepers resulting from this collection of information?**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**14. What is the annualized cost to the Federal Government?**

In general, Fiscal Service has determined that there are no annualized non-labor, printing, or distribution costs to the Government associated with this information collection.

Fiscal Service processes this collection to verify the validity of the transaction requested by the owner and to maintain a record of the request. In addition, there are no printing and distribution costs associated with this collection as it is available on the Fiscal Service website in electronic form.

As for Federal Government labor costs, Fiscal Service has determined that its labor costs for this information collection are limited to analyzing incoming correspondence concerning Treasury securities and securities transactions requests. Therefore, Treasury estimates its labor costs for submissions of this collection as follows:

GS-7 Step 5 Customer Service Specialist for the locality pay area of Rest of U.S.	Fully-loaded Labor Rate/Hour <sup>2</sup>	Avg. Processing Time per Response	Labor Costs per Response	Total Responses	Total Labor Costs
	\$43.39	15 minutes	\$10.8475	450	\$4,881.38

**15. What is the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I?**

No changes or adjustments are reported.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

The results of the collection of this information will not be published for statistical use.

**17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?**

The public interest will be better served by not displaying an expiration date on this form.

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<sup>2</sup>Federal Government Fully-loaded Labor Rate per Hour = Wage rate x a factor of 1.63 to account for benefit costs. Per the Office of Personnel Management (OPM) wage data, the hourly fully-loaded labor rate for a GS-7, step 5, Federal employee in the Parkersburg, WV (RUS) wage area is \$43.39 (\$26.62 wages plus \$16.77 in benefit costs). See the OPM website at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf)

The time period during which the current edition of the form will continue to be usable cannot be predicted. It could easily span several cycles of review and OMB clearance renewal. Displaying the expiration date would make it necessary to update the electronic form and website where it is accessed after each renewal. Additionally, not displaying the expiration date on the form will avoid confusion among members of the public who may have identical forms with different expiration dates in their possession. By not displaying the expiration date, supplies of the form could continue to be used regardless of when the OMB approval has expired. This would reduce costs incurred through additional printing and desktop publishing.

**18. What are the exceptions to the certification statement?**

There are no exceptions to the certification statement.